

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

YOUNG AMERICA’S FOUNDATION;
BINGHAMTON UNIVERSITY COLLEGE
REPUBLICANS; and JON LIZAK, President
of the College Republicans of Binghamton
University,

Plaintiffs,

v.

HARVEY STENGER, President of SUNY-
Binghamton, in his official and individual
capacities; BRIAN ROSE, Vice President for
Student Affairs of SUNY-Binghamton, in his
official and individual capacities; JOHN
PELLETIER, Chief of SUNY-Binghamton
UPD, in his official and individual capacities;
COLLEGE PROGRESSIVES, a student
organization at SUNY-Binghamton;
PROGRESSIVE LEADERS OF TOMORROW
(“PLOT”); STUDENT ASSOCIATION OF
BINGHAMTON UNIVERSITY,

Defendants.

Civil Action No. 3:20-cv-822 (LEK/ML)

PLEASE TAKE NOTICE, that non-party, Aviva Friedman, by and through her attorney, Melissa Wischerath, will bring a motion for a protective order regarding plaintiff’s discovery requests and deposition questions pursuant to Fed. R. Civ. Proc. 26(c) before this Court on a date and time which will be provided by the Court later, hereby requesting that the Court issue a protective order regarding plaintiff’s discovery requests and deposition questions pursuant to Fed. R. Civ. Proc. 26(c).

DATED this 3rd day of November, 2021.

/s/ Melissa D. Wischerath
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